

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CITY OF ALMATY, KAZAKHSTAN,  
and BTA BANK JSC,

Plaintiffs,

v.

FELIX SATER, DANIEL RIDLOFF, BAYROCK  
GROUP INC., GLOBAL HABITAT  
SOLUTIONS, INC., RRMI-DR, LLC, FERRARI  
HOLDINGS LLC and MEM ENERGY  
PARTNERS LLC,

Defendants.

No. 19 Civ. 2645 (AJN) (KHP)

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and Declaration of Matthew L. Schwartz, Plaintiffs City of Almaty and BTA Bank, by and through their attorneys Boies Schiller Flexner LLP, will move this Court before the Honorable Alison J. Nathan, at the U.S. District Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007, at such date and time the Court sets, for an order compelling Defendants Felix Sater, Bayrock Group Inc., and Global Habitat Solutions, Inc. to produce documents in response to Plaintiffs' Third Requests for Production, and such other relief as the Court deems just and proper.

Dated: New York, New York  
December 11, 2020

Respectfully,

/s/ Matthew L. Schwartz

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